UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

MICHELLE R. PURCELL,)	
Plaintiff,)	
Timinity,)	
v.)	Coss No. 4.14 av 01192
ROBERT A. McDONALD,)	Case No. 4:14-cv-01182
Secretary,)	
Department of Veterans Affairs,)	
Defendant.)	
)	

JOINT MOTION TO DISMISS ALL CLAIMS WITH PREJUDICE AND MEMORANDUM IN SUPPORT

Plaintiff Michelle R. Purcell and Defendant Robert A. McDonald, Secretary of Veterans Affairs, file this Joint Motion to Dismiss all Claims with Prejudice and offer the following information in support:

The parties have compromised and settled all claims in this lawsuit, including all those claims, third party claims, counter-claims and cross-claims of any kind which were asserted or which could have been asserted in this lawsuit. The parties therefore ask the Court to dismiss the case with prejudice. The parties agree that the settlement as allocated among the parties is necessary, reasonable, fair, and appropriate.

Accordingly, the parties ask the Court to dismiss all claims with prejudice, with each party bearing its own costs and fees. A proposed order is attached.

Respectfully submitted,

/s/Woodrow Epperson (by consent)

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CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2014, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Woodrow Epperson jepper1068@aol.com

I further certify that I have mailed by U.S. mail the paper to the following non-ECF participants:

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<u>/s/KENNETH SHAITELMAN</u>

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